

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRIS POCIASK,)	
)	
Plaintiff,)	Case No. 09 C 5054
)	
v.)	Judge Lefkow
)	
MIDLAND CREDIT MANAGEMENT, INC.,)	Magistrate Judge Schenkier
BLATT, HASENMILLER, LEIBSKER &)	
MOORE, LLC,)	
)	
Defendant.)	

**MIDLAND CREDIT MANAGEMENT INC.'S UNOPPOSED MOTION FOR
SECOND EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, Midland Credit Management, Inc. ("MCM"), by its attorneys, Katrina S. Christakis and Raechelle Delarmente (Grady Pilgrim Christakis Bell LLP, *of counsel*), respectfully requests, with Plaintiff's agreement, that the Court extend the time Defendant has to file its responsive pleading to Plaintiff's Complaint, to and including November 5, 2009. In support of this motion, MCM states as follows:

1. On August 19, 2009, MCM was served with the Complaint alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* and the Illinois Collection Agency Ac, 225 ILCS 425/1 *et seq.*
2. On September 4, 2009, Defendant filed an Unopposed Motion for Extension of Time to Answer or Otherwise Plead (Docket No. 15), which the Court granted (Docket No. 19). Accordingly, Defendant's responsive pleading is currently due to be filed on October 6, 2009.

3. MCM is still conducting an internal investigation into Plaintiff's allegations.

Moreover, Plaintiff's counsel and Defendant's counsel are engaged in settlement negotiations to resolve this matter.

4. Accordingly, MCM requests additional time to file an answer or to otherwise plead to Plaintiff's Complaint, to and including November 5, 2009.

5. Counsel for MCM has contacted Plaintiff's counsel, and Plaintiff has no objection to this requested extension of time.

WHEREFORE, Defendant, Midland Credit Management, Inc., respectfully requests, with Plaintiff's agreement, that the Court extend the time MCM has to file its answer or to otherwise plead to Plaintiff's Complaint, to and including November 5, 2009.

Respectfully submitted,

MIDLAND CREDIT MANAGEMENT, INC.

By: /s/ Raechelle Delarmente
One of its attorneys

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CERTIFICATE OF SERVICE

Raechelle Delarmente, an attorney, certifies that on October 6, 2009, she electronically filed the foregoing **Midland Credit Management, Inc.'s Unopposed Motion for Second Extension of Time to Answer or Otherwise Plead** with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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Cassandra P. Miller, cmiller@edcombs.com

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/s Raechelle Delarmente

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